

LATHAM & WATKINS LLP

Motion Hearing

Moog Inc. v. Skyrise, Inc. et al.

Case No. 1:22-cv-187-LJV-JJM

Defendant Skyrise, Inc.'s Presentation

October 20, 2022

Skyryse Counsel’s May 4 Letter

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GIBSON DUNN

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Host Serial	Last Disconnected (UTC)	Volume Name	VSN
FM1W5J3	2/25/22 12:07 AM	MISOOK	
FM1W5J3	2/13/22 6:52 PM	D:\	
FM1W5J3	2/25/22 11:54 PM	CRUZER	
J54MD5K	2/13/22 7:21 PM	NO NAME	55D28D65
J54MD5K	2/18/22 2:32 AM		80FC319F
J54MD5K	3/31/22 6:33 PM	D:\; Misook	EC979D10
HSYLDK3		D:\	55D28D65
C1DD6J3	2/14/22 5:49 PM	NO NAME	55D28D65
C1DD6J3	3/24/22 6:30 PM	E:\; Misook	EC979D10
174LDK3	2/20/22 4:27 PM	NO NAME	55D28D65
JGNV5J3	2/13/22 8:04 PM	NO NAME	55D28D65
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684LDK3	2/28/22 10:43 PM	D:\; Misook	EC979D10
4S8LDK3	2/14/22 5:39 PM	NO NAME	55D28D65
CXGD6J3		D:\	55D28D65
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CRGD6J3		D:\	55D28D65
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The above-listed SanDisk Cruzer devices are not in the possession of Skyryse, based on our investigation to date, and Skyryse does not know the universe of documents or information contained on those devices. Skyryse’s investigation into the interactions between Skyryse employees and the SanDisk Cruzer devices is ongoing.

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Ray Wang
Gonzalo Rey
Tim Baptist

David Tearse
Derek Shiells
Danny Stillion
Liisa Bishop
Nigel Cranwell

Chris Smith
Chris Cole
Andre Michelin
Deniz Karakas
Jeff Becker

“[W]e are continuing to investigate the issues we have identified”

“[O]ur investigation is ongoing”

“... the answers provided at this stage may be subject to change.”

“Moog information may have been accessed ... primarily via ... personal USB devices held by Alin Pilkington and Misook Kim”

“Skyryse’s investigation into the interactions between Skyryse employees and the SanDisk Cruzer devices is ongoing.”

No admissions, no conclusions.

Moog’s Motion: “9 Laptops”

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Nigel Cranwell

Chris Smith
Chris Cole
Andre Michelin
Deniz Karakas
Jeff Becker

Laptop Serial No.

USB Device Serial No.

1.
2.
3.
4.
5.
6.
7.
8.
9.

Host Serial	Last Disconnected (UTC)	Volume Name	VSN
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Moog’s Motion: “9 Laptops”

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1.

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174LDK3	2/20/22 4:27 PM	NO NAME	55D28D65
JGNV5J3	2/13/22 8:04 PM	NO NAME	55D28D65

2.

3.

4.

5.

6.

Laptop Produced

7.

4S8LDK3	2/14/22 5:39 PM	NO NAME	55D28D65
CXGD6J3		D:\	55D28D65

Laptop Produced

8.

CRGD6J3		D:\	55D28D65
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9.

Laptop Produced

Moog’s Motion: “9 Laptops”

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FM1W5J3	2/25/22 11:54 PM	CRUZER	
Irrelevant – USB Device “connection” was by IT Department only			55D28D65
J54MD5K	2/18/22 2:32 AM		80FC319F
J54MD5K	3/31/22 6:33 PM	D:\; Misook	EC979D10
Irrelevant – USB Device “connection” was by IT Department only			55D28D65
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Irrelevant – USB Device “connection” was by IT Department only			55D28D65
			55D28D65
Laptop Produced			
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Moog’s Motion: “9 Laptops”

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Moog’s Motion: “9 Laptops,” “1 USB Device”

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C1DD6J3	3/24/22 6:30 PM	E:\; Misook	EC979D10

Moog demands 1 USB device:

- “55D28G65” - IT Department’s device to set up laptops – irrelevant

Other:

- “EC979D10” - image already produced in entirety
- “80FC319F” – already produced to iDS by Kim and Skyryse provided relevant laptop connection histories – no need for entire laptops
- “SanDisk” Cruzer = Not Skyryse’s property; subject of third party discovery